REMARKS

Claims 1-12, 21 and 35-36 were previously pending, with Claims 13-20, 22-34 and 37-38 withdrawn. The pending claims were rejected. The claims are amended, and four new Claims 39-41 are added. Reconsideration and allowance is respectfully requested.

Specification

The Abstract was objected to, and is thus replaced. Reconsideration and withdrawal of the rejection to the Abstract is respectfully requested.

Section 101 Rejections

Claims 1-12, 21 and 35-36 were rejected as not directed to statutory subject matter as they were viewed as not using any technological art. Independent Claim 1 is amended to define an inference engine that uses an inference strategy. Reconsideration and withdrawal of the Section 101 rejection is thus respectfully requested.

Section 102 Rejections

Claims 1-2 and 21 were rejected as anticipated by Abir, publication No. 2004/0122656 A1. Abir claims priority through seven CIP applications, each based on two earlier filed provisional applications. Only one of those provisional applications predates the applicant's filing date of June 15, 2001. The only portion of Abir which is thus prior art to the present application is Prov. 60/276,107, filed March 16, 2001. While Abir's published application has 250 pages of specification, the March 16, 2001 provisional application which predates the applicant's filing, consists of only 12 pages, double spaced.

A copy of Prov. 60/276,107 is attached. It discloses a four step method for translating sentences into different languages, and uses as examples translating English sentences into Hebrew sentences. A sentence is (1) parsed into words which are (2) then examined and translated individually using a database, and (3) examined in overlapping pairs and translated in pairs using a database, and finally (4) the translation of overlapping pairs are combined to eliminate redundancies in the translation. If the one or two word combination does not exist in the database, the user is asked to input a translation.

The text cited by the Examiner does NOT appear in the 12 pages of Abir which are possibly prior art to the present application. Nothing in Abir indicates the translation results in a

translated sentence that is more structured than the original sentence – all Abir says is that overlapping, redundant translations are eliminated. Prov. App. at 7.

Further, the Abir application does not meet the requirements of the amended claims, which define unstructured or partially unstructured name and address information. Abir discusses translating sentences from one language to another language. Abir is not concerned with the improvement of the structure of a database so as to render the database more portable but rather is more broadly related to the translation of the contents of a database in one language into another language irrespective of improving the structural content of the original data.

Further, Abir's translations compare individual words, and pairs of words to see if preexisting definitions exist. The meanings are either preexisting in the database, or the user is asked to provide the meaning of one or at most two words. No indication is given in Abir that the translated text will be more structured and portable.

Moreover, there is no indication of using an inference strategy as defined in Claim 21. Elements 302, 304 and 308 in Figure 3 are not found in the only provisional application which is prior art to the present application. Abir uses existing terms, and no inference strategy is mentioned or envisioned.

As Abir does not meet the requirements of amended Claims 1, 2 and 21, there is no anticipation. Reconsideration and withdrawal of the rejections are respectfully requested.

Section 103 Rejections

Claims 3-12, and 35-36 were rejected as obvious over Abir in view of Hetherington (6,272,495). The Abir reference cited by the Examiner has 250 pages of specification and drawing, but the only portion that is prior art to the present application consists of 12 pages, double spaced, in a provisional application with numerous illustrations of translating English to Hebrew. The Examiner has not cited any portion of Abir that is prior art, and which can be combined to reject the pending claims. This is especially so as the amended claim refer to address data and Abir is directed toward a different problem of translating a sentence from one language into another language using single words, and pairs of adjacent words.

The Examiner has not met his burden of proof. There is no showing where the few pages of Abir that are actually prior art portion disclose the claim requirements. This is especially so as

the basic combination required by the only independent claim are not met by Abir alone, or in combination.

Further, the reason offered for combining Abir and Hetherington is "the intended broad application of the Abir's system." Office Action at ¶15, pg. 6. The only portion of Abir that is actually prior art is not intended for a broad application and is instead for a narrow translating application. Moreover, any broad application is not enabled by the few pages of the provisional application, most of which are examples illustrating the translation from English to Hebrew. There is thus no proper suggestion to combine the references.

Further, the results of the processes referred to in Abir and Hetherington are entirely different. Hetherington, essentially makes no changes to the original database but rather generates an arguably more efficient way to access the unchanged raw data. Abir generates a new form of the same data in the form of a translation into another language. There is no teaching that the translation in Abir is any more structurally efficient that the original document from which it was translated, and it will be in a different written or spoken language. The different applications and operation teach against combining these two patents. The Examiner is requested to avoid using the applicant's claims as a roadmap to identify references disclosing isolated portions of the claimed combination, and then making-up reasons to combine those references. There is thus no proper suggestion to combine the references.

The Examiner is requested to reconsider, and withdraw, the Section 103 rejections.

New Claims

New dependent Claims 39-42 are added. Antecedent basis is most easily found in the prior claims (especially Claims 4-6 and 9), and at page 10 of the written description. Further, new Claim 42 defines the data input and output to be in the same language, which is contrary to Abir. These new claims are believed allowable, and such allowance is respectfully requested.

CONCLUSION

Applicant respectfully submits that all of the remaining Claims, namely, Claims 1-12, 21, 35 and 36 are in condition for allowance. Entry of the amendments and issuance of a Notice of Allowance is therefore respectfully requested. Should the Examiner have any suggestions for expediting allowance of the application, please contact applicant's representative at the telephone number listed below.

If any additional fee is required, please charge Deposit Account Number 19-4330.

Respectfully submitted,

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